



UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

Rakim Paulin

Plaintiff,

-against-

COMPLAINT
JURY TRIAL
DEMANDED

C.O. C. Szematowicz, C.O. E. Gordon,
C.O. G. Dooman

Defendants.

22 CV 6133-LJS

Plaintiff Rakim Paulin brings forth this Complaint against the above named defendants and alleges the following:

1) This is a Civil Action seeking relief and/or damages to defend and protect the rights guaranteed by the United States Constitution. This action is brought pursuant to 42 USC §1983. The court has jurisdiction over the action pursuant to 28 USC §§1331, 1343(3)(4) and 2201.

PARTIES TO THIS ACTION

2) Plaintiff is a resident of the County of Dutchess, New York State and presently resides at Franklin Correctional Facility, 62 Bare Hill Road, PO Box 10, Malone, New York 12953-0010.

3) Defendants are residents of Attica, New York State and Reside and/or are located at:

- A. C.O. C. Szematowicz
Wyoming Correctional Facility
PO Box 501
Attica, New York 14011-0501
- B. C.O. E. Gordon
Wyoming Correctional Facility
PO Box 501
Attica, New York 14011-0501
- C. C.O. G. Dooman
Wyoming Correctional Facility
P.O. Box 501
Attica, New York 14011-0501

LAWSUIT IN STATE AND FEDERAL COURT

4) Plaintiff has not begun any other lawsuits in State or Federal Court dealing with the same facts involved in this action

5) Plaintiff has been a plaintiff in the following cases that have all been settled. However, case Numbers and filing dates are unavailable.

- A. Paulin v. Dutchess County, et al
- B. Paulin v. Zalucky, et al
- C. Paulin v. Federicks, et al
- D. Paulin v. Sassi, et al
- E. Paulin v. Sassi

EXHAUSTION OF ADMINISTRATIVE REMEDIES:

Annexed Records:

- EXHIBIT A - Cover letter and four (4) grievances dated May 15, 2019, addressed to the Inmate Grievance Program Supervisor C. Sputore at Orleans Correctional Facility.
- EXHIBIT B - Cover letter and four (4) Grievances dated May 15, 2019, addressed to the Inmate Program Supervisor at Wyoming Correctional Facility.
- EXHIBIT C - Response from the Inmate Grievance Program Supervisor at Wyoming Correctional Facility in relation to Exhibit B.
- EXHIBIT D - Inmate copy of facility disbursement form showing copy of Exhibit C.
- EXHIBIT E - Follow-up letter with copy of Exhibit –C-, forwarded to the Inmate Grievance Program Supervisor C. Sputore at Orleans Correctional Facility.
- EXHIBIT F - Notice of Appeal to Inmate Grievance Program Supervisor C. Sputore, to forward to Central Office Review Committee, pursuant to Departmental Grievance Directive 4040 Section 701.8(G) on the grounds that grievant did not receive any decisions on his grievances within time constraints. Copy also forwarded to Inmate Grievance Program Supervisor MS. Hartz at Cape Vincent Correctional Facility
- EXHIBIT G - Request to Inmate Grievance Program Supervisor C. Sputore for a copy of the written notice of receipt of appeal by the Central Office Review Committee pursuant to Directive 4040 Section 701.3(3)(i). Copy forwarded to Inmate Grievance Program Supervisor MS. Hartz.

FACTS:

- 1) On April 24, 2019, while at Wyoming Correctional Facility, at approximately 4:05 p.m., while at M-1 housing unit, Plaintiff Rakim Paulin was violently assaulted by Defendant C. Szematowicz and by Defendant E. Gordon after a strip search conducted by said defendants, namely;
- 2) Immediately after a strip search, plaintiff was placed in hand-restraints by Defendant Szematowicz. Once the handcuffs were firmly placed on plaintiff, defendant Szematowicz kicked plaintiff in his lower back with his left foot. He then kicked plaintiff in the testicles with his right foot.
- 3) Immediately thereafter, defendant Szematowicz grabbed plaintiff by the throat with his left hand and repeatedly proceeded to strike plaintiff in the head and face with his right hand. While plaintiff was being assaulted by defendant Szematowicz, defendant Gordon began to Punch plaintiff repeatedly in the back, stomach, and ribs with both hands.
- 4) During the assault, plaintiff was knocked unconscious by defendant Szematowicz. Approximately 10 minutes later plaintiff was awakened by defendant Szematowicz throwing water from the toilet brush water bucket onto his face.
- 5) Plaintiff was then escorted by both defendants to the facility infirmary.
- 6) Upon arriving at the facility infirmary, plaintiff was placed in a holding cell.
- 7) At approximately 7:25 p.m., plaintiff was escorted to the facility special housing unit (SHU), by defendant G. Doom, and E. Gordon, as well as Sgt. Deblasso.
- 8) After being processed, plaintiff was placed in a SHU Cell. Once secured, plaintiff immediately began to complain about the assault and the poor cell conditions to Sgt. Deblasso.

- 9) Sgt. Deblasso replied that she would look into the matter, and then left the SHU unit.
- 10) At approximately 7:30 p.m., defendants E. Gordon and G. Dooman arrived at plaintiff's cell door without Sgt. Deblasso.
- 11) Defendant G. Dooman then opened plaintiff's food slot/hatch and ordered plaintiff to place his hands outside the hatch to be handcuffed.
- 12) Plaintiff complied, and was then placed in hand restraints by G. Dooman.
- 13) Defendant G. Dooman then ordered plaintiff's cell door opened by the (SHU) C.O.
- 14) Once open, defendants Dooman and Gordon began to punch, kick, and knee the plaintiff.
- 15) During the assault, plaintiff was hit in the stomach until he vomited. Plaintiff was also knocked to the ground during the assault.
- 16) Both defendants then walked out of plaintiff's cell.
- 17) Defendant Dooman then ordered plaintiff's cell door closed.
- 18) Once closed, defendant Dooman ordered plaintiff to place his hands outside of the hatch to retrieve his handcuffs.
- 19) Plaintiff complied and defendant Dooman retrieved his cuffs.
- 20) Defendant Dooman then said, "I dare you to tell anyone else", implying that his actions were retaliation for plaintiff telling Sgt. Deblasso what had happened, intended to silence plaintiff. He further stated that, "there are no cameras in these small SHU units, which means we can fuck you up whenever we want."
- 21) At approximately 8:20 p.m., plaintiff requested and then received a pan for defecation from defendant E. Gordon.
- 22) Upon completion, plaintiff immediately returned the pan to defendant Gordon.
- 23) At approximately 8:50 p.m., plaintiff's cell was frisked.

- 24) At approximately 9:30 p.m., a SHU nurse, provider #248, came to complete plaintiff SHU Health admission screening.
- 25) Plaintiff informed the nurse of his pain.
- 26) The nurse replied, “man up” and walked away.
- 27) Plaintiff was denied a mattress upon his repeated request from defendants Gordon and Dooman. Plaintiff was subjected to a SHU cell that had other inmate’s feces and urine all over floors and walls. Plaintiff brought this to the attention of defendants Gordon and Dooman, as well as the Deputy Superintendent for Security Yehl/Yenl. As a result, plaintiff contracted “athlete’s foot”, along with “Jock itch”.
- 28) Plaintiff brought all the above to the attention of the Deputy Superintendent for Security Yehl/Yenl during her rounds on 4/26/19 at 11:10 a.m., and on 4/30/19 at 10:10 a.m.
- 29) The Dept. of Security Yehl/Yenl replied that everything being done to plaintiff was punishment for being on a one on one watch.
- 30) Plaintiff replied that his rights were being violated and that they were subjecting him to cruel and unusual punishment; and that departmental directive 4910 was not being adhered to.
- 31) Dept. Yehl/Yenl replied, “We don’t follow the directive for one on one watch down here.” As a result, Plaintiff was subjected to these harsh conditions from 4/24/19 to 5/15/19.
- 32) On May 11, 2019, at approximately 6:00 p.m., defendant Dooman spit in plaintiff’s chow tray before handing the tray to plaintiff.

- 33) Due to plaintiff's perplexed look, defendant Dooman stated that it was for plaintiff's constant complaining. He then stated that if plaintiff kept it up, he would be back in to teach plaintiff another lesson.
- 34) Defendant Dooman further stated that he took some items from plaintiff personal property.
- 35) Plaintiff replied that if he did, he would have to pay for the items.
- 36) Defendant Dooman laughed, and stated that he never had to pay before; and that if he ever were caught he would just blame it on the morning shift or just retire. He further stated that, "there are no cameras in the small-Box Facility SHU, insinuating that he could get away with anything he wants.
- 37) Upon inspection, the following items were missing from plaintiff personal property bags.
- A. 15 Packs of Newport's
 - B. 3 Girl Magazines
 - C. 50 Stamps
 - D. 75 Packs of Tuna
 - E. Religious Chain
 - F. Electric Trimmers

DAMAGES:

Because of the violations of Plaintiff State and Federal Constitutional Rights, plaintiff seeks damages for his injuries, including cruel and unusual punishment living conditions.

INJURIES:

1. Two contusions and bruises to head.
2. Two contusions and bruises to face.

3. Bruises and swelling to ribs
4. Bruises to stomach.
5. Bruises and swelling to left leg.
6. Bruises and swelling to lower back
7. Bruises and swelling to scrotum sack.
8. Athlete's feet for 8 weeks.
9. Jock itch for 8 weeks.
10. Permanent damages to lower back at L5-S1
11. Increased usage of pain medication for 6 months.
12. Physical therapy for lower back from 7/23/19 to 9/26/19, and again from 1/22/22 until
Present date.
13. Serious scrotum/testicle pain for 4 weeks and continuous dull pain thereafter, where
One testicle is now enlarged and considered by the Doctor at Wyoming Correctional
Facility , on April 29, 2019 to be permanent damage.
14. Pain and suffering.
15. Plaintiff seeks compensatory and punitive damages in the amount to be determined at
Trial against each named defendant.
16. A preliminary and permanent injunction ordering defendants to place cameras in all
Medium Correctional Facility Special Housing units to combat systemic assaults by
Departmental personnel, and to control the influx of inmates lawsuits perpetrated by
DOCCS Personnel in these special units.

17. It is also in the public interest to grant the injunction because inmates with disabilities (Mental health) are the ones most often being assaulted in these small box units. The injunction will save the State and Federal government millions of dollars, and free up the Courts Dockets in association with the (PLRA) Prison Litigation Reform Act.

18. Whereas, it is vital to ensure that the U.S. and State Constitutions continue to be honored and not violated by DOCCS Personnel. This would assure confidence in DOCCS and in our Criminal Justice System.

Respectfully Submitted,



Rakim Paulin 18-A-0552
Franklin Correctional Facility
62 Bare Hill Rd., P.O. Box 10
Malone, NY 12953

Plaintiff declares under penalty of perjury, pursuant to 28 U.S.C.A. sec. 1746, that the foregoing is true and correct, and that such has been executed and placed in a United States Postal Service Mailbox maintained at Franklin Correctional Facility, Malone, NY 12953, on the 9 day of March 2022, to be forwarded to the Western District of New York Pro-Se Office for processing:



RAKIM PAULIN

EXHIBIT-A

RAKIM PAULIN 18A0552
S-C2-49B
ORLEANS CORRECTIONAL FACILITY

MAY 15, 2019

INAMTE GRIEVANCE PROGRAM SUPERVISOR
C. SPATORE
ORLEANS CORRECTIONAL FACILITY

Re: Four Attached Grievances

DEAR GRIEVANCE COORDINATOR:

Enclose for filing please find four grievances concerning incidents at Wyoming C.F.

RESPECTFULLY SUBMITTED


RAKIM PAULIN

Cc: File

GRIEVANCE

RAKIM PAULIN

18A0552

5/15/19

S-C2-49B


On April 24, 2019 at approx 4:05 P.M. grievant was assaulted by C.O. C. Szematowicz and C.O. E. Gordon after a strip search conducted on housing unit M-1. In which grievant was first placed in hand restraints by C.O. Szematowicz, and then kicked in the back, and testicles. Immediately thereafter C.O. Szematowicz grabbed grievant by the throat and started to punch grievant in the head and face. While C.O. E. Gordon begin to punch grievant in the back, stomach, and ribs. Grievant was knocked unconsciounes by C.O. Szematowicz. Approx 10 minutes later grievant was awaked by C.O. Szematowicz throwing water into grievants' face. Grievant was then excorted by both officers to the facility infirmary.

Upon arriving at the facility infirmary plaintiff was placed in a holding cell. At approximately 7:25 P.M., plaintiff was escorted to the facility special houseing unit (SHU), by C.O. G. Dooman, C.O. E. Gordon, and a femal Sgt. After being processed plaintiff was placed in a (SHU) cell. Once secured plaintiff immediately begin to complain about the assault, and cell conditions to the femal Sgt...The femal Sgt. replied she would look into the matter. The Sgt. then left the (SHU) unit.

Action Requested:

- (1) Directive be followed
- (2) People involved reprimanded
- (3) Video/ Audio placed in SHU

SINCERELY


RAKIM PAULIN

GRIEVANCE

RAKIM PAULIN

18a0552

5/15/19


S-C2-49B

On April 24,2019 at approx 7:30 P.M., grievant was assaulted by C.O. G. dooman and C.O. E. Gordon after being placed in a one on one SHU cell. In which grievant was first placed in hand restraints by C.O. Dooman. C.O. Dooman then ordered grievants' cell door open. Once open both officers begin to punch and kick grievant. During the assault grievant threw up, and was also knocked to the ground from their blows. Both officers then left grievants' cell. Once grievants' cell door was closed C.O. Dooman retrieved the handcuffs.

Action Requested:

- (1) Officers reprimanded
- (2) Video/ Audio placed in SHU

SINCERELY


RAKIM PAULIN

GRIEVANCE

RAKIM PAULIN

18A0552

5/15/19

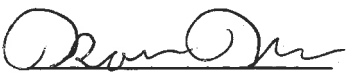
S-C2-49B

This is a grievance because while on a one on one watch from 4/24/19 to 5/1/19, I was placed in a feces and urine cell. I was denied a mattress upon my repeated request. Denied a wash cloth and wash bucket upon my repeated request. Brought this matter to the attention of numerous officials. Even the Dept of Security who informed me that it was part of my punishment for being on a one on one watch. I informed her that I never violated any rules to be subjected to this type of treatment. She replied we don't follow the directive down here.

Action Requested:

- (1) Directive be followed
- (2) People involved reprimanded
- (3) Video/ Audio placed in SHU

SINCERELY


RAKIM PAULIN

GRIEVANCE

RAKIM PAULIN

18A0552

5/15/19

S-c2-49B

On May 11, 2019 at approx 6:00 P.M., while handing out evening chow, C.O. Dooman spite in grievant's food, and then ~~stated it~~ was for grievant complaining. He also stated that if grievant kept it up, he would be back in to teach grievant another lesson. He further stated that he took some items out of grievants' property. Grievant replied that if he did, then he would have to pay for the items he took. He then laughed and stated that he never had to pay before. And that if he ever got caught he would just blame it on the morning shift, or just retire.

The following items were missing from grievants' property.

15 Packs of Newports, 3 girl magazines, 50 stamps, 75 packs of tuna, religious chain, and electric trimmers. Compare I-64 form from Attica dated 4/22/19, and I-64 form from Wyoming dated 4/24/19.

Action requested:

- (1) Officer reprimanded
- (2) Video/ audio placed in SHU

SINCERELY



RAKIM PAULIN

EXHIBIT- B

RAKIM PAULIN 18A0552
ORLEANS CORRECTIONAL FACILITY
3531 GAINS BASIN Rd.,
ALBION, N.Y. 14411-9199

MAY 15, 2019

INMATE GRIEVANCE PROGRAM SUPERVISOR
WYOMING CORRECTIONAL FACILITY
P.O. BOX 501
ATTICA, N.Y. 14011-0501

Re: Four Grievance Grievances

Dear grievance coordinator:

Enclose for filing please find four grievances concerning incidents at Wyoming correctional facility.

RESPECTFULLY SUBMITTED

Cc: File


RAKIM PAULIN

(1) C.SPATORE
ORLEANS CORRECTIONAL FACILITY

GRIEVANCERAKIM PAULIN18A05525/15/19S-C2-49B


On April 24, 2019 at approx 4:05 P.M. grievant was assaulted by C.O. C. Szematowicz and C.O. E. Gordon after a strip search conducted on housing unit M-1. In which grievant was first placed in hand restraints by C.O. Szematowicz, and then kicked in the back, and testicles. Immediately thereafter C.O. Szematowicz grabbed grievant by the throat and started to punch grievant in the head and face. While C.O. E. Gordon begin to punch grievant in the back, stomach, and ribs. Grievant was knocked unconsciounes by C.O. Szematowicz. Approx 10 minutes later grievant was awaked by C.O. Szematowicz throwing water into grievants' face. Grievant was then excorted by both officers to the facility infirmary.

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Action Requested:

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SINCERELY


RAKIM PAULIN

GRIEVANCE

RAKIM PAULIN

18a0552

5/15/19


S-C2-49B

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Action Requested:

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- (2) Video/ Audio placed in SHU

SINCERELY


RAKIM PAULIN

GRIEVANCE

RAKIM PAULIN

18A0552

5/15/19

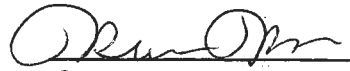
S-C2-49B

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Action Requested:

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- (2) People involved reprimanded
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SINCERELY


RAKIM PAULIN

GRIEVANCE

RAKIM PAULIN

18A0552

5/15/19

S-c2-49B

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Action requested:

- (1) Officer reprimanded
- (2) Video/ audio placed in SHU

SINCERELY



RAKIM PAULIN

EXHIBIT-C

NEW YORK STATE DEPARTMENT OF CORRECTIONS
AND COMMUNITY SUPERVISION
WYOMING CORRECTIONAL FACILITY
INMATE GRIEVANCE PROGRAM

TO: Paulin, R 18A0552, Orleans



FROM: A. Romesser, Supervisor Inmate Grievance Program

RE: Grievance

DATE: May 23, 2019

I received your grievances dated 5/15/19. Per Directive 4040, § 701.5 (a) "The Complaint may only be filed at the facility where the inmate is housed even if it pertains to another facility." Any issues must be addressed through your current facility. Your grievances are being returned to you.

cc: File

EXHIBIT- D

STATE OF NEW YORK - DEPARTMENT OF CORRECTIONS AND COMMUNITY SUPERVISION

DISBURSEMENT OR REFUND REQUEST

CELL LOCATION

NAME

RAKTON PAULIN

DATE

5/28

20

19

CODE TYPE

1	2	3
---	---	---

INMATE NUMBER

18A0552

"SHORT NAME"

RPAU

FIRST INITIAL
FIRST 3 OF LAST NAME

CHECK/ORDER NUMBER

103112

RIGHT ADJUSTED WITH LEADING ZEROS

COMMISSARY PRODUCT GROUP

☐

AMOUNT \$

7777.10

SENT TO CODE
(SEE TABLE B-6)
☐
ITEM
DESCRIPTION

(1) Legal copies

LAST NAME

FIRST NAME

MI

SUFF

ADDRESS

APT. NO.

SENT TO OR
PURCHASE FROM

CITY

STATE

ZIP CODE

I HEREBY ACKNOWLEDGE EXPENDITURE OF THE
AMOUNT TO BE DEDUCTED FROM MY INMATE
ACCOUNT.

APPROVED

E. P. N.

(SOURCE AREA)

DATE

5/29/19

APPROVED

ES

(BUSINESS OFFICE)

DATE

5/29/19

(INMATE SIGNATURE)

FORM 2706 (7/11)

Original - Business Office

Yellow - Approving Office

Pink - Inmate

EXHIBIT- E

RAKIM PAULIN 18A0552
S-C2-49B
ORLEANS CORRECTIONAL FACILITY

JUNE 3, 2019

INMATE GRIEVANCE PROGRAM SUPERVISOR
C. SPATORE
ORLEANS CORRECTIONAL FACILITY

Re: Grievances

DEAR GRIEVANCE SUPERVISOR C. SPATORE:

PLEASE TAKE NOTICE that I am enclosing the following:

- (1) Four grievances concerning incidents at Wyoming C.F.
- (2) A communication from the inmate Grievance Supervisor A. Romesser at Wyoming C.F.

Please note that although I forwarded my four grievances to you in a timely manner, this correspondence is just to inform you of the correspondence I received from the Inmate Grievance Supervisor A. Romesser at Wyoming C.F..

Thanking you in advance for your time and assistance.

RESPETFULLU SUBMITTED


RAKIM PAULIN

Cc: File

EXHIBIT- F

RAKIM PAULIN 18A0552
CAPE VINCENT CORRECTIONAL FACILITY
36560 STATE ROUTE 12E
CAPE VINCENT, N.Y. 13618

JULY 12, 2019

INMATE GRIEVANCE PROGRAM SUPERVISOR
C. SPATORE
ORLEANS C.F.
3531 GAINES BASIN Rd.
ALBION, N.Y. 14411

Re: Notice of Decision to Appeal

DEAR GRIEVANCE SUPERVISOR C. SPATORE:

NOTICE OF DECISION TO APPEAL TO CORC PURSUANT TO DIRECTIVE 4040-
SECTION 701.8(G):

PLEASE TAKE NOTICE that I never received any decision from the Orleans C.F. SUPT.,
concerning my four harassment grievances that I filed on May 15, 2019; and again on June 3,
2019.

So at this time I respectfully appeal the Supt. Denial to CORC.

RESPECTFULLY SUBMITTED


RAKIM PAULIN

Cc: file

1. MS. HARTZ
IGRP SUPERVISOR
CAPE VINCENT C.F.

EXHIBIT- G

RAKIM PAULIN 18A0552
CAPE VINCENT CORRECTIONAL FACILITY
36560 STATE ROUTE 12E
CAPE VINCENT, N.Y. 13618

AUGUST 28, 2019

INAMTE GRIEVANCE PROGRAM SUPERVISOR
C. SPATORE
ORLEANS C.F.
3531 GAINES BASIN Rd.
ALBION, N.Y. 14411

Re: Request Copy of the Written Notice of Receipt of my Appeal to CORC

DEAR GRIEVANCE SUPERVISOR C. SPATORE:

PLEASE TAKE NOTICE that within (45) days of filing my appeal to CORC dated July 12, 2019, I haven't received a copy of the written notice of (receipt) by CORC pursuant to Directive 4040- Section 701.5-(3) CORC action. Sub (i).

So at this time I respectfully request to know if my appeal was filed and transmitted to CORC.

RESPECTFULLY SUBMITTED


RAKIM PAULIN

Cc: File

1. MS. HARTZ
IGRP SUPERVISOR
CAPE VINCENT C.F.

RAKIM PAULIN 18A0552

FRANKLIN CORRECTIONAL FACILITY
P.O. BOX 10, 62 BARE HILL ROAD
MALONE, NEW YORK 12953



CLERK OF THE COURT
UNITED STATES DISTRICT COURT
200 U.S. COURTHOUSE
2 NIAGARA SQUARE
BUFFALO, NEW YORK 14202-3498

LEGAL MAIL CONFIDENTIAL

CORRECTIONAL FACILITY



03/16/22

2920